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June 13, 2005

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station, 2nd Floor
Boston, MA 02110

RE: D.T.E. 04-116- Investigation by the Department of Telecommunications and Energy On Its Own Motion Regarding the Service Quality Guidelines Established in Service Quality Standards for Electric Distribution Companies and Local Gas Distribution Companies, D.T.E. 99-84 (2001)

Dear Secretary Cottrell:

Please find attached the responses of Boston Edison Company, Cambridge Electric Light Company, Commonwealth Electric Company, d/b/a NSTAR Electric and NSTAR Gas Company (together with NSTAR Electric, "NSTAR") to information requests DTE-LDC-2-1 through 2-3 asked by the Department of Telecommunications and Energy in its Second Set of Discovery to All Electric Companies in the above-referenced proceeding. The Company will file its responses to the remaining two questions as soon as possible.

Please contact me, Cheryl Kimball or Kerry Britland at NSTAR if you have any questions regarding the filing.

Very truly yours,

John K. Habib

Enclosure
cc: Service List
Jody Stiefel
Joseph Rogers, Assistant Attorney General

Information Request DTE-LDC 2-1

Please provide, to the extent such information is available, your LDCs average response time in minutes from the receipt of a report that electrical wires are lying in the road (such as would result from a vehicle collision with a distribution pole or a tree structure failure) to the arrival of a service crew at the scene of the accident.

Response

NSTAR Electric does not track its response time to reports of downed wires. One issue is that, although the Company's outage-management system has the capability to track multiple timeframes in the life of a trouble call, the system cannot distinguish between calls that relate to a downed (energized) electrical wire and other wire-down situations that do not pose a risk to the public safety, such as de-energized electrical wires or downed telephone, cable or fire alarm wires not owned by the Company. These types of non-emergency (non-NSTAR) events comprise the majority of the downed wire calls responded to by NSTAR troubleshooters. Although NSTAR responds to all downed-wire calls in order to ensure the public safety, the Company does not find a value in focusing its resources on the collection, tracking, and monitoring of "response" time to these events because of the large number involving non-NSTAR equipment or non-emergency situations.

Moreover, as discussed in response to DTE-LDC-2-3, the Company's operating procedures change under storm conditions to address the particular circumstances of the storm. During these periods, the Company may receive thousands of customer calls regarding downed wires and other service issues, making it difficult to track and record data relating to downed wires and to adhere to "standard" response times when higher-priority events occur.

Information Request DTE-LDC 2-2

Please provide the approximate length of time that is required to de-energize downed wires from the time a Company service crew arrives at the scene of the accident. For purposes of this question, assume that the associated feeder is not remotely controlled.

Response

Please see the Company's response to information request DTE-LDC-2-1. NSTAR Electric does not track or record this information, nor does the Company believe that this information would be of value in structuring its operations. Each downed-wire event is unique in terms of the circumstances presented to the troubleshooter responding to the call, and therefore, will involve a timeframe that is particular to that set of circumstances. Moreover, the Company's highest priority in those situations is worker safety over ensuring the tracking of timeframes. The Company's troubleshooters need to take the time necessary to make the situation safe without jeopardizing their own health and safety. Accordingly, recording the time that it takes to de-energize downed wires is not a priority for the Company.

Information Request DTE-LDC 2-3

Please comment on the feasibility of adopting a service quality performance standard for electric LDC's response times to downed wire reports, similar to the service quality performance standard for gas distribution company odor response calls.

Response

Gas odor-call response times are a legitimate and widely accepted service-quality metric for gas utilities for two reasons: (1) virtually all gas odors stem from one cause, i.e., leaks in the underground distribution system; and (2) the ramifications of an unattended gas leak are such that there is no higher priority than a timely response to make the situation safe. The situation differs substantially with downed-wire reports, and therefore, it is not feasible to implement a comparable service-quality performance standard for electric distribution companies.

One critical difference between gas-odor calls and downed-wire reports is that downed wires do not necessarily relate to the electric company's distribution infrastructure. Overhead utility poles host a number of facilities that are not owned or maintained by the electric distribution companies, including cable, telephone and fire alarm wires, as well as wires for other uses. However, when a line is down, police and fire officials or other concerned citizens will almost always call the electric company rather than the owner of the downed wire. This is because a live electrical wire poses a public safety concern and the majority of citizens and customers do not know the difference between a downed electric wire or a telecommunications wire. Therefore, although a large portion of downed-wire reports do not relate to electric-utility equipment, electric utilities are nearly always the first-responders to reports of downed wires. Also, because the Company does not always know whether its wires are involved until a crew arrives on site, the Company always responds to downed-wire reports. However, the implementation of a service-quality metric to measure response time would not be appropriate because the Company is under no obligation to serve as the "responder" for infrastructure that it does not own or maintain.

Another critical difference between gas and electric operations is that the gas distribution system is underground, and therefore, is largely unaffected by stormy weather. Conversely, the overhead electric distribution system is highly sensitive to stormy weather events that have the potential occur throughout the year. Therefore, all electric distribution companies have in place storm-response procedures, which generally rely on temporary reassignments of employees from their routine work assignments to storm-response assignments, on an as needed basis. Thus, stormy

weather creates two concerns for the Company in terms of tracking response time to downed wires. First, because the Company is relying on personnel temporarily assigned to meet storm conditions, it would be difficult for the Company to implement a response-time tracking mechanism and to train employees on that protocol because the employees that would be called upon to follow that protocol during storm periods are only temporarily assigned to that function, are infrequently assigned to that function, and differ over time depending on the location and timing of the storm. More importantly, during a storm period, the Company is most interested in maintaining service to customers and quickly and safely repairing distribution problems that are causing customer outages. Performing this type of record-keeping duty would be an unwarranted distraction from the important tasks at hand, especially given the additional wrinkle of having to sort out and record whether the downed wire is a distribution wire.

Lastly, although it is never desirable to have downed wires in the street of any type, under storm conditions where a series of events may be taking place that require an urgent response, it is possible to make the situation safe by posting personnel to guide motor vehicle or pedestrian traffic around the obstruction while the Company's crews deal with higher priority events. The great majority of downed wires are not energized, and therefore, do not pose a significant public-safety risk aside from inconvenience. Moreover, downed wires, even if energized, will not have the public-safety ramifications comparable to gas. With a gas leak, a timely response by the gas company is needed to identify the source of the odor and remediate the situation as needed. Therefore, monitoring response times to downed-wire reports does not have the value that it has in the gas industry where the gas utility's immediate response is necessary to avert safety concerns that cannot be addressed in any other way.